

FILED

JUNE 15, 1984

NEW JERSEY STATE BOARD  
OF MEDICAL EXAMINERS

WILBERT, CLYNE AND MONTENEGRO, P.A.  
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Attorneys for Respondent

IN THE MATTER OF THE SUSPENSION OR  
REVOCATION OF THE LICENSE OF  
FRANK PERRUSO, D.C.

TO PRACTICE CHIROPRACTIC IN THE  
STATE OF NEW JERSEY

: STATE OF NEW JERSEY  
: DEPARTMENT OF LAW AND  
: PUBLIC SAFETY  
: DIVISION OF CONSUMER  
: AFFAIRS  
: STATE BOARD OF MEDICAL  
: EXAMINERS  
: Docket No. H-84-5188  
: Administrative Action

ANSWER

FRANCESCO (FRANK) PERRUSO, with office at 223 Pleasant  
Drive, in the Township of Brick, County of Ocean and State of  
New Jersey, in answer to Complainant's Complaint says:

COUNT ONE

1. The Respondent, Francesco Perruso, neither admits or  
denies the allegations contained in Paragraphs 1, 2, 6 & 7 of  
the First Count of the Complaint, and leaves Complainant to  
its proofs.

2. The Respondent admits the allegations contained in Paragraphs 3 & 5 of the First Count of the Complainant's Complaint.

3. The Respondent denies the allegations contained in Paragraph 4 of the First Count of the Complainant's Complaint.

COUNT TWO

1. Respondent Francesco Perruso repeats and realleges his answers to the First Count of the Complaint as though set forth herein at length.

2. Respondent neither admits or denies the allegations contained in Paragraphs 3, 4, 5 & 6 of the Second Count of the Complainant's Complaint.

3. The Respondent admits the allegations contained in Paragraph 2 of the Second Count of the Complaint.

WHEREFORE, Respondent Francesco Perruso demands the following, to wit: a) Judgment dismissing the Complainant's Complaint.

SEPARATE DEFENSE

None of the allegations as stated by the Complainant state a cause of action for which relief can be granted.

DATED: 6-4-74

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BY: 

NICHOLAS C. MONTENEGRO, ESQUIRE